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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

SPECTACULAR SOLAR CORP.

Debtor.

Chapter 11

Case No. 22-18522 (CMG)

Honorable Christine M. Gravelle

**RESPONSE OF CREDITOR, SHAKTI GROUP USA,
TO DEBTOR'S CHAPTER 11 PLAN OF REORGANIZATION**

Creditor, Shakti Group USA ("Shakti"), by and through its undersigned counsel, by way of response to confirmation of the proposed modified Chapter 11 Plan (the "Plan") (Doc. 46) of Spectacular Solar Corp. (the "Debtor"), respectfully states as follows:

1. On October 27, 2022, the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code.
2. On January 25, 2023, the Debtor file its Chapter 11 Small Business Subchapter V Plan. (Doc. 32).
3. On February 14, 2023, the Debtor filed its Modified Small Business Debtor's Plan. (Doc. 46).
4. On March 7, 2023, this firm filed a notice of appearance on behalf of Shakti in the Debtor's bankruptcy case.

RESPONSE

5. Shakti purchased certain solar panels and related items from the Debtor. The Debtor has the panels and is storing same. There is no question that the panels are not property of the estate and belong to Shakti. This firm is negotiating a settlement with the Debtor and its counsel and are hopeful to complete the settlement this week. That said, however, Shakti reserves any and all rights to assert a claim depending on the amount owed after determining value of the panels and related items that are returned. The court's consideration of this response is most appreciated.

6. Based upon the foregoing, Shakti files this response to confirmation of the Debtor's Plan.

7. Shakti reserves its right to raise additional responses at the confirmation hearing as information develops.

Respectfully submitted,

McMANIMON SCOTLAND & BAUMANN, LLC
Attorneys for Creditor, Shakti Group USA

Dated: March 20, 2023

By: /s/ Sari B. Placona
SARI B. PLACONA